KARDARAS & KELLEHER LLP 44 Wall Street New York, NY 10005 (212) 785-5050 Attorneys for Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ENERGIZER S.A.,

Plaintiff,

07 CV 7406 (LTS)

Against

ECF CASE

M/V YM GREEN her engines, boilers and : Tackle *in rem*; YANG MING MARINE

TRANSPORT CORP.; YANGMING (UK) LTD.; :

ALL OCEANS TRANSPORTATION INC.;

KAWASAKI KISEN KAISHA LTD.; CONTERM:

HONG KONG LTD.; VANGUARD LOGISTICS

SERVICES HONG KONG LTD.;

FIEGE GOTH CO., LTD.; and SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.

ANSWER TO CONTINGENT

CROSS-CLAIM OF

DEFENDANTS YANG MING MARINE TRANSPORT CORP. AND YANGMING (UK) LTD.

Defendants.

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Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. ("High Power"), by its attorneys Kardaras & Kelleher LLP, as and for its answer to the Contingent Cross-Claim of Yang Ming Marine Transport Corp. ("Yang Ming Marine") and Yangming (UK) Ltd. ("Yangming (UK)") contained in the amended answer to plaintiff's complaint, alleges upon information and belief as follows:

1. Denies the allegations contained in paragraph 45 of the Contingent Cross-Claim of defendants Yang Ming Marine and Yangming (UK).

2. Denies each and every allegation contained in paragraph 46 of the Contingent Cross-Claim of defendants Yang Ming Marine and Yangming (UK) insofar as it refers to defendant High Power, and denies knowledge or information sufficient to form a belief as to the remaining defendants.

3. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraph 47 of the Contingent Cross-Claim of defendants Yang Ming Marine and Yangming (UK).

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

4. Defendant High Power claims the benefit of all defenses raised by co-defendants and plaintiff in its response to cross-claims and counterclaims as well as its defenses set forth in its answer to plaintiff's complaint insofar as said defenses may be applicable to defendant High Power.

WHEREFORE, Defendant High Power prays that the Contingent Cross-Claim of Yang Ming Marine and Yangming (UK) be dismissed with prejudice together with costs, disbursements and attorney's fees and for such other and additional relief as to the Court may seem just and proper.

Dated: New York, NY February 28, 2008

Respectfully submitted,

KARDARAS & KELLEHER, LLP 44 Wall Street New York, NY 10005 Attorneys for Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.

By:

Villiam H. Kardaras (WK-8835)

To: HILL RIVKINS & HAYDEN LLP

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CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL AND BY ECF

The undersigned declares under penalty of perjury that the following is true and correct:

- 1. I am over the age of eighteen years and I am not a party to this action.
- 2. On February 28, 2008, I served a complete copy of SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.'s Answer to Contingent Cross-Claim of Defendants Yang Ming Marine Transport Corp. and Yangming (UK) Ltd., by regular U.S. mail and/or by ECF, to the following attorneys at their respective ECF registered address and/or at the following address:

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LENNON MURPHY & LENNON

Dorothy A. Donnelly